

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed August 2, 2004. Claims 1-22 were pending in the Application. In the Office Action, Claims 1-22 were rejected. In order to advance and expedite the prosecution of the present Application, Applicants amend Claims 1, 5, 9 and 13, Applicants cancel without prejudice or disclaimer Claims 4 and 10, and Applicants add new Claims 23-36. Thus, Claims 1-3, 5-9 and 11-36 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 102 REJECTIONS

The Examiner rejected Claims 1-3 and 6-9 under 35 U.S.C. §102(b) as being anticipated by B. Schmidt, M. Lam, and J. Northcutt, "The Interactive Performance of SLIM: A Stateless, Thin-Client Architecture," *Proceedings of the Seventeenth ACM Symposium on Operating Systems Principles*, Vol. 33, Issue 5, December 1999, pg. 32-47 (hereinafter "*Schmidt*"). Applicants respectfully traverse this rejection.

Of the rejected Claims 1-3 and 6-9, Claims 1 and 9 are independent. Applicants respectfully submit that *Schmidt* does not disclose or even suggest each and every limitation of amended Claims 1 and 9. For example, Applicants respectfully submit that *Schmidt* does not disclose or even suggest "a display decompression unit coupled to said display frame buffer and operable to decompress said graphics image data" as recited by amended Claim 1, or "decompressing said graphics image data by a decompression unit of said network attachable display device" as recited by amended Claim 9. Therefore, for at least this reason, *Schmidt* does not anticipate independent Claims 1 and 9 as amended.

Claims 2-3 and 6-8 that depend from independent Claim 1 are also not anticipated by *Schmidt* at least because they incorporate the limitations of Claim 1 and also add additional elements that further distinguish *Schmidt*. Therefore, Applicants respectfully request that the rejection of Claims 2-3 and 6-8 be withdrawn.

SECTION 103 REJECTIONS

Claims 4, 5, 10, 11 and 13-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Schmidt* in view of and U.S. Patent No. 5,974,471 issued to Belt (hereinafter "*Belt*"). Claim 12 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Schmidt* and *Belt* and further in view of U.S. Patent No. 6,936,616 issued to Torborg, Jr. et al. (hereinafter "*Torborg*"). Applicants cancel Claims 4 and 10 without prejudice or disclaimer, rendering the rejection of Claims 4 and 10 moot. Applicants respectfully traverse these rejections for remaining Claims 5 and 11-22.

Of the remaining rejected Claims 5 and 11-22, Claim 5 depends from independent Claim 1, Claims 11-14 depend from independent Claim 9, and Claims 16-22 depend from independent Claim 15. At least for the reasons discussed above, independent Claims 1 and 9 are patentable over the cited reference. Therefore, Claims 5 and 11-14 that depend respectively from independent Claims 1 and 9 are also patentable. Accordingly, Applicants respectfully request that the rejection of Claims 5 and 11-14 be withdrawn.

Applicants respectfully submit that the Examiner has not established a *prima facie* case of obviousness as to independent Claim 15. Independent Claim 15 recites "a display decompression unit operable to decompress said graphics image data into decompressed graphics image data." In the Office Action, the Examiner admits that *Schmidt* does not expressly teach a display decompression unit operable to decompress said graphics image data (Office Action, page 4). However, the Examiner also states that *Belt* teaches a computer system with distributed compression and decompression, and that it would have been obvious to have utilized the distributed compression and decompression logic of *Belt* in the *Schmidt* console (Office Action, page 4). Applicants respectfully disagree. *Schmidt* appears to disclose a SLIM protocol by "refreshing the display [of the console] from a local frame buffer

and transmitting only pixel updates” (*Schmidt*, page 35, section 2.2). *Schmidt* further discloses that:

[a] SLIM console is simply a dumb frame buffer. It receives display primitives, decodes them and hands off the pixels to the graphics controller . . . allowing us to make the desktop unit a cheap, interchangeable, fixed-function device. It is completely stateless and runs neither an operating system nor any applications”

(*Schmidt*, page 35, section 2.3). *Schmidt* also discloses that “[i]n the SLIM architecture, all processing is performed on a set of server machines” (*Schmidt*, page 35, section 2.4). Thus, *Schmidt* appears to teach away from the proposed combination of references as suggested by the Examiner at least because *Schmidt* appears to simplify the console of *Schmidt* by placing all data processing at the server of *Schmidt* and transmitting only display primitives to the console of *Schmidt*, in contrast to the Examiner’s suggestion that additional processing be added to the console of *Schmidt*. Therefore, for at least this reason, Applicants submit that independent Claim 15 is patentable over the *Schmidt* and *Belt* combination as suggested by the Examiner.

Claims 16-22 depend from independent Claim 15. As described above, independent Claim 15 is in condition for allowance. Therefore, Claims 16-22 are also in condition for allowance, and Applicants respectfully request allowance of Claims 16-22.

NEW CLAIMS

Applicants add new Claims 23-36. New Claims 24-30 depend from new independent Claim 23, and new Claims 32-36 depend from new independent Claim 31. New independent Claim 23 recites, in part, “a display network interface operable to receive rendered graphics image data of an image over a communication network,” “a display frame buffer operable to store said received rendered graphics image data,” and “a display refresh unit operable to read said rendered graphics image data from said display frame buffer,” and new independent Claim 31 recites, in part, “receiving . . . rendered graphics image data of said image over a communication network,” “storing said received rendered graphics image data in a display frame buffer of said network attachable display device,” “reading said stored rendered graphics image data from said display frame buffer by a display refresh unit” and “displaying said

image on a display unit.” The cited art, alone or in combination, do not disclose, teach or suggest the limitations of new independent Claims 23 and 31. Therefore, Applicants respectfully request allowance of new independent Claims 23 and 31 and new Claims 24-30 and 32-36 that depend from new independent Claims 23 and 31.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

With the presentation of new Claims 23-36, an excess independent claim fee of \$176.00 pursuant to 37 C.F.R. § 1.16(b) is believed due, and an excess claim fee of \$216.00 pursuant to 37 C.F.R. § 1.16(c) is believed due. The Commissioner is hereby authorized to charge \$392.00 to Deposit Account No. 08-2025 of Hewlett-Packard Company to cover the excess claim fees. If, however, Applicant has miscalculated the fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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Date: 10-28-04

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